UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

IN THE MATTER OF:

MAHMOUD S. RAHIM and,

RAYA H. ABDULHUSSAIN

Debtors.

Chapter 7

Case No. 10-57577-swr

Hon. Steven W. Rhodes

Civil Case No. 2:10-CV-15123

Hon. Sean F. Cox

Hon. Michael Hluchaniuk

APPELLANTS' STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL

Appellants, Mahmoud S. Rahim and Raya H., the Debtors, by their attorneys Gold, Lange & Majoros, P.C., for their Statement of Issues to be Presented on Appeal, pursuant to Bankruptcy Rule 8006, state as follows:

- Whether the Bankruptcy Court erred when it utilized standards set forth under 11 1. U.S.C. §707(b) to deny Chapter 7 Bankruptcy relief to Appellants, whose obligations are primarily non-consumer debts.
- 2. Whether the Bankruptcy Court erred when it decided that the Debtors did not filed their Chapter 7 Bankruptcy Case in good faith, warranting dismissal "for cause" under 11 U.S.C. §707(a).

GOLD, LANGE & MAJOROS, P.C.

Dated: January 6, 2011 /s/ Jason P. Smalarz

> JASON P. SMALARZ (P71042) Attorney for Debtors 24901 Northwestern Highway, Suite 444 Southfield, Michigan 48075 (248) 350-8220

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2011, I electronically filed (1) Appellants' Statement of Issues to be Presented on Appeal; and (2) Certificate of Service with the Clerk of Court using ECF system which will send notification of such filing to the following:

Scott T. Seabolt, Esq. Foley & Lardner, LLP One Detroit Center 500 Woodward Ave., Suite 2700 Detroit, Michigan 48228 Todd W. Grant, Esq. Richard E. Segal, Esq. Richard E. Segal & Associates 6230 Orchard Lake Rd., Suite 294 West Bloomfield, Michigan 48322

/s/ Jason P. Smalarz

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